

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

information associated with Discord, Inc. user names “pill0wtalk” and “greygrim” that is stored at premises owned, maintained, controlled, or operated by Discord, Inc. with company headquarters at 444 De Haro St., San Francisco, California.

Case No.23-983M(NJ)

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Wisconsin
(identify the person or describe the property to be searched and give its location):

Please see Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (*identify the person or describe the property to be seized*):

Please see Attachment B.

YOU ARE COMMANDED to execute this warrant on or before 8/23/2023 *(not to exceed 14 days)*

☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Honorable Nancy Joseph.
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (*check the appropriate box*)

☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .

Date and time issued:8/9/2023 @ 2:15 p.m.

Judge's signature

City and state: Milwaukee, WI

Honorable Nancy Joseph, U.S. Magistrate Judge
Printed name and title

Return

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

Attachment A
Property to be Searched

This warrant applies to information associated with Discord, Inc. usernames “**pill0wtalk**” and “**greygrim**” that is stored at premises owned, maintained, controlled, or operated by Discord, Inc. with company headquarters at 444 De Haro St., San Francisco, California.

Attachment B
Particular Things to be Seized

I. Information to be disclosed by Discord, Inc.

To the extent that the information associated with the accounts described in Attachment A is within the possession, custody, or control of Discord Inc., regardless of whether such information is located within or outside of the United States, and including any messages, records, files, logs, or information that have been deleted but are still available to Discord, Inc., or have been preserved pursuant to a request made, Discord, Inc. is required to disclose the following information to the government for each account or identifier listed in Attachment A, from May 1, 2023 to the present:

- a. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);
- b. The types of service utilized by the user;
- c. All records or other information stored by an individual using the account, including saved communications, image files or video files;
- d. All records pertaining to communications between Discord Inc. and any person regarding the account, including contacts with support services and records of actions taken.

The Provider is hereby ordered to disclose the above information to the government within 14 days of issuance of this warrant.

II. Information to be seized by the Government

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. 2252(a)(2), 2251(a), and 2252(a)(4)(B) involving the account described in Attachment A since May 1, 2023, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- a. Images of child pornography, as defined in 18 U.S.C. 2256.
- b. Any record or document pertaining to the possession, receipt, and/or distribution of child pornography, as defined in 18 U.S.C. 2256.
- c. Any record or document identifying persons transmitting, through interstate commerce, including by computer, any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- d. Any record or document bearing on the receipt, shipment, orders, requests, trades, purchases, or transactions of any kind involving the transmission through interstate commerce, including by computer, of any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- e. Any record or document pertaining to the preparation, purchase, and acquisition of names or lists of names to be used in connection with the receipt, distribution, trade,

- or transmission, through interstate commerce, of any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- f. Any record or document which lists names and addresses of any minor visually depicted while engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
 - g. Any record or document which shows the offer to transmit through interstate commerce any depictions of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
 - h. Any and all materials or items which are sexually arousing to individuals who are interested in minors, but which are not in and of themselves obscene or which do not necessarily depict minors involved in sexually explicit conduct. Such material is commonly known as, "child erotica" and includes written materials dealing with child development, sex education, child pornography, sexual abuse of children, incest, child prostitution, missing children, investigative techniques of child exploitation, sexual disorders, pedophilia, nudist publications, diaries, and fantasy writings. "Child erotica," may also include, in this context, sex aids and/or toys.
 - i. Electronically stored communications or messages reflecting computer online chat sessions or e-mail messages with, or about, a minor that are sexually explicit in nature, as defined in 18 U.S.C. § 2256.
 - j. The identity of the person(s) who created or used the account listed in Attachment A, including records that help reveal the whereabouts of such person(s).
 - k. The identity of the person(s) who communicated with the account listed in Attachment A about matters relating to 18 U.S.C. 2252A(a)(2) and 2252A(a)(5)(B), including records that help reveal their whereabouts.
 - l. Chats between the user and any minor.
 - m. All other information or items that constitute fruits, contraband, evidence, or instrumentalities of violations of 18 USC § 2252, those violations involving the Subject Accounts and occurring since May 1, 2023.

This warrant authorizes a review of electronically stored information, communications, other records, and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts.

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Case No.23-983M(NJ)

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"greygrim" that is stored at premises owned, maintained, controlled, or
operated by Discord, Inc. with company headquarters at 444 De Haro St.,
San Francisco, California.

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Please see Attachment A.

located in the _____ Eastern _____ District of _____ Wisconsin _____, there is now concealed (identify the person or describe the property to be seized):

Please see Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 2251(a)	Attempted Production of Child Pornography
18 U.S.C. § 2252(a)(2)	Receipt/Distribution of Child Pornography
18 U.S.C. § 2252(a)(4)(B)	Possession of Child Pornography

The application is based on these facts:

Please see attached Affidavit.

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Sarah Dettmering, Special Agent, FBI

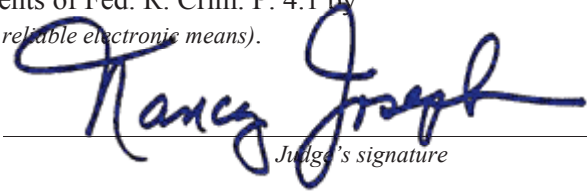
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

TELEPHONE

(specify reliable electronic means).

Date: 8/9/2023


Judge's signature

City and state: Milwaukee, WI

Honorable Nancy Joseph, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Sarah Dettmering, being first duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Discord account that is stored at premises owned, maintained, controlled, or operated by Discord, Inc., a company headquartered in the San Francisco, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Discord, Inc. to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the account.

2. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since January 2018, and am currently assigned to the Milwaukee Division as a member of the Milwaukee Child Exploitation and Human Trafficking Task Force. My duties include investigating criminal violations relating to child sexual exploitation and child pornography. While employed by the FBI, I have investigated federal criminal violations related to child exploitation and child pornography. I have received training from the FBI specific to investigating child pornography and child exploitation crimes and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in various forms of media. As a result of my training, experience, and discussions with other law enforcement officers assigned to investigate child pornography and child exploitation, I am familiar with methods by which electronic devices are used as the means for receiving, transmitting, possessing, and distributing images and videos depicting minors engaged in

sexually explicit conduct. I have also received training and gained experience in interview and interrogation techniques with enhanced training specific to cybercrimes, social media search warrants, residential search warrants, interviews, and interrogations of subjects of criminal investigations, electronic device identification and forensic review.

3. The facts contained in this affidavit are known to me through my personal knowledge, training, and experience, and through information provided to me by other law enforcement officers, who have provided information to me during the course of their official duties and whom I consider truthful and reliable.

4. Based upon the information described below, I submit that probable cause exists to believe that the user of the Discord accounts in the name of “pill0wtalk” (SUBJECT ACCOUNT 1) and “greygrim” (SUBJECT ACCOUNT 2), collectively the SUBJECT ACCOUNTS has committed the crime of attempted production of child pornography, in violation of Title 18, United States Code, Section 2251(a), receipt/distribution of child pornography in violation of Title 18, United States Code, Section 2252(a)(2), and possession of child pornography in violation of Title 18, United States Code, Section 2252(a)(4)(B). I further submit that evidence relating to this crime, more particularly described in Attachment B, can be found in the contents of the SUBJECT ACCOUNTS, more particularly described in Attachment A. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. 2711. 18 U.S.C. 2703(a), (b)(1)(A), & (c)(1)(A).

Specifically, the court is “a district court of the United States, that has jurisdiction over the offense being investigated.” 18 U.S.C. 2711(3)(A)(i).

DEFINITIONS

6. The following definitions apply to the Affidavit and Attachment B to this Affidavit:

a. “Child Pornography” is defined in 18 U.S.C. § 2256 as any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct. Child pornography is also commonly referred to as Child Sexual Abuse Material, or “CSAM.”

b. “Chat,” as used herein, refers to any kind of text communication over the Internet that is transmitted in real-time from sender to receiver. Chat messages are generally short in order to enable other participants to respond quickly and in a format that resembles an oral conversation. This feature distinguishes chatting from other text-based online communications such as Internet forums and email.

c. The “Internet” is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

d. “An Internet Protocol address” (IP address) is a unique numeric address used by internet-enabled electronic storage devices to access the Internet. An IP address is a

series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every electronic storage device attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that electronic storage device may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static that is, long-term IP addresses, while other computers have dynamic that is, frequently changed IP addresses.

e. “Minor” means any person under the age of eighteen years. See 18 U.S.C. § 2256(1).

f. The terms “records,” “documents,” and “materials” include all information recorded in any form, visual or aural, and by any means, whether in handmade form (including writings and drawings), photographic form (including prints, negatives, videotapes, motion pictures, and photocopies), mechanical form (including printing and typing) or electrical, electronic or magnetic form (including tape recordings, compact discs, electronic or magnetic storage devices such as hard disks, CD-ROMs, digital video disks (DVDs), Personal Digital Assistants (PDAs), Multi Media Cards (MMCs), memory sticks, smart cards, or electronic notebooks, as well as digital data files and printouts or readouts from any magnetic, electrical or electronic storage device).

g. “Sexually explicit conduct” means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person. See 18 U.S.C. § 2256(2).

h. “Visual depictions” include undeveloped film and videotape, and data stored on a computer disk or by electronic means, which is capable of conversion into a visual image. See 18 U.S.C. § 2256(5).

i. “Website” consists of text pages of information and associated graphic images. The textual information is stored in a specific format known as Hyper-Text Mark-up Language (HTML) and is transmitted from the web servers to various web clients via Hyper-Text Transport Protocol.

BACKGROUND ON DISCORD

7. Discord is a messaging platform where millions of users from around the world connect with each other through chat, voice, and video. Discord has both a desktop (PC, Mac, Linux) application and a mobile (iOS, Android) application, and the service can also be accessed from the website directly at www.discordapp.com.

8. In order to use the services, users need to create an account by selecting a username. Once they’ve made their account, users can create a server and invite their friends to join it with an invite link, or they can join an existing server. Servers are broken down into sub-categories or “channels” where users can connect with each other by either chatting or calling. Users can also communicate through direct messages, which are private chats created between 1-10 users.

9. To create a Discord account, the user is also required to provide an email address which is verified by Discord.

10. Providers like Discord, Inc. typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session)

times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account, and other log files that reflect usage of the account. In addition, providers often have records of the Internet Protocol address ("IP address") used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the SUBJECT ACCOUNTS.

11. In some cases, Discord users will communicate directly with a provider about issues relating to their account, such as technical problems, billing inquiries, or complaints from other users. Providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records of any actions taken by the provider or user as a result of the communications.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

12. On or about July 28, 2023, FBI Milwaukee received a report of an unidentified subject (the Subject) engaged in the sextortion of a minor female victim, aged sixteen (MV). The Subject was using the SUBJECT ACCOUNTS to threaten MV with exposure of MV's nude images/videos if MV did not continue to produce further sexually explicit content for the Subject.

13. MV reported this incident to the FBI and was subsequently interviewed by an FBI Agent. During the interview MV provided the following information:

- a. MV originally connected with the Subject on "E-Pal" which is described on the "E-Pal" website as "a social platform for gamers to make friends worldwide

through playing video games.” Through E-Pal MV paid the Subject to play an online video game with MV.

b. MV and the Subject transitioned from communicating through the video game to Discord, where the Subject used the SUBJECT ACCOUNTS.

c. When MV and the Subject first started communicating MV indicated that MV was approximately nineteen or twenty years old. MV later disclosed to the Subject that MV was sixteen years old and in high school.

d. MV and the Subject communicated through direct messages, voice calls, and video chats on Discord.

e. During the video chats, MV would share MV’s video with the Subject, but the Subject would not get on camera to show MV what the Subject looked like. Also, during the video chats between the SUBJECT ACCOUNTS and MV the Subject would request that MV take MV’s clothes off and perform sexual acts. MV also sent images of MV in MV’s underwear to each of the SUBJECT ACCOUNTS.

f. The Subject made MV feel as though MV had to provide sexual content in order to have a relationship with the Subject. MV wanted a more emotional relationship with the Subject and felt that the Subject used MV for the sexual content without reciprocating any emotions.

g. At one point, in or about June 2023, the Subject sent MV a vibrator and lubricant through Amazon. This vibrator was able to be connected to a cell phone application, “Lovense Remote,” which allowed the device to be controlled remotely. The Subject also had the “Lovense Remote” application and could control the vibrator while MV used it.

h. After MV disclosed MV's age to the Subject, MV decided that MV no longer wanted to communicate with the Subject anymore. The Subject told MV that if MV used the vibrator on camera one more time then the Subject would delete "everything" that the Subject had of MV.

14. MV and MV's parents provided consent for the FBI to search MV's cell phone. I subsequently reviewed the Discord messages between MV and the SUBJECT ACCOUNTS. MV blocked SUBJECT ACCOUNT 1, but the blocked messages from SUBJECT ACCOUNT 1 could be made visible. MV did not block SUBJECT ACCOUNT 2 but was not friends with the account on Discord and only MV's messages in the thread were visible.

15. The message thread with SUBJECT ACCOUNT 2 started on or about May 19, 2023, with a four-hour long call. The first direct messages between MV and SUBJECT ACCOUNT 2 started on or about May 26, 2023.

16. On or about May 27, 2023 MV sent the following message to SUBJECT ACCOUNT 2 "we dont have a good emotional connection/you never respond/and im just getting the impression you dont care/all i want is to build an emotional connection/and i don't want you to only "make time" to use me/ i don't want to be used every night/and im starting to feel like im emotionally being used."

17. On or about May 27, 2023 MV sent the following message to SUBJECT ACCOUNT 1 "I bought some new underwear." The Subject responded to MV stating "bras too or just panties?/Daddy's good little girl, messaging me like I said, you did good, Im proud of you/.. nvm you took 30+ minutes to message me back stupid whore, you will beg to have the blessing and privilege to belong to me or be called mine, ever again, the only thing I want to see from you next when you see this is 'Please Daddy Im your dumb little good girl and Im

worthless unless Im serving you, You're my God and I want to be your slave forever then we can talk after."

18. On or about June 6, 2023 the following message exchange between MV and SUBJECT ACCOUNT 1 (SA1) took place:

MV: actually seeing my body, i look how i weigh right?

SA1: no not at all actually, you look great you hold any bit of fat in the correct places

MV: I stg [swear to god] if i see my ass on some fucked up website

SA1: ??

MV: like screen record

SA1: Im not a cuck, anything I see on your body is MINE

MV: okay, but what if youre fooling me/make me think im yours so I do these things then make money off of me

19. These messages indicated that MV showed the Subject MV's "ass" during video calls.

20. On or about June 28, 2023 MV sent a message to SUBJECT ACCOUNT 1 which stated " grey when do i get to see you? Its been more than 2 weeks since i gave you my address/why do i have to wait so long, youve seen every inch of me and know alot about me/you said you would show me after i got the toy and its been 2 weeks since ive had it/im starting to lose hope that ill get to see you... its hard to trust, but i took the risk of you using my body to post publicly or any bad circumstance/and ive showed and told you all the information you wanted to know/you have the complete power to do whatever you want with what i gave you, but i trust that you wont."

21. On or about July 3, 2023 MV sent a message to SUBJECT ACCOUNT 2 which stated “I said this last night/Or/2 nights ago, you’ll have to use me earlier in the night bc I have to wake up early.” Through the interview with MV “use me” indicates that MV would follow the Subject’s orders on video chat, which involved removing MV’s clothes.

22. On or about July 18, 2023 MV sent a message to SUBJECT ACCOUNT 2 which stated “Okay I’m just gonna say it/I’ve been lying about some things/So yeah.”

23. On or about July 18, 2023 MV sent a message to SUBJECT ACCOUNT 1 which stated that MV had to go to MV’s mom’s house “bc they have split custody/I lied to you again.”

The following chat exchange then took place between MV and SA1:

SA1: ?

MV: Ykwim [you know what I mean]

SA1: I really dont tell me

MV: Yes you do

SA1: girl if you lied, tell me what you lied about, youll feel better about it/hello?

MV: connect the dots dummy

...

MV: My boyfriend is in my age range and you’re not, we have a big age gap

SA1: how old are you??

MV: Connect the dots man

...

SA1: are you serious..? you didn’t think telling me your correct age wouldnt have been a good idea?? why did you lie about that?/how old are you??

MV: consenting age

...

SA1: How old are you seriously

MV: I'm in school/I don't have a liscense

SA1: [SA1 uses MV's real name]

MV: I can get one/Old enough to get one/Just don't have one/I don't have an id/Yeah?/I'm an upperclassman

...

SA1: bruh you were unironically grooming yourself

...

SA1: well youre not wrong, I am the package deal, but Im torn because i like you but its so fucked up that you did that and puts us both in a terrible position, I could lose my business and everything because you lied about that/ well 13 is consenting nor is it upperclass

MV: I never had any intentions with fucking with your business/But I planned on leaving you for a while and I figured I'd tell you bc you have so much info on me/You wouldn't give away that info especially if they're underage

SA1: no Im saying if I came there and wefucked, they would think Im a predator (which I am just like sexually not for someone underaged)/ why would you think I would give away info in the first place??

...

MV: I was born 2005-2010

24. On or about July 21, 2023 MV sent a message to SUBJECT ACCOUNT 1 which stated, "I'm literally 16."

25. On or about July 21, 2023 MV sent a message to SUBJECT ACCOUNT 2 which stated, "You're weird af/I get you're trying to protect yourself, do something and if I find out about I do have all the resources to ruin everything./I trusted you with my information and if you wanna use that against me I can definitely do vice versa." Although the Subject's messages are not available in the chat, based upon MV's messages it appears as though the Subject started to threaten to use the information the Subject had on MV in retaliation for MV stating that MV had been lying about "some things" which would include MV's age.

26. On or about July 25, 2023 the following chat exchange took place between MV and SUBJECT ACCOUNT 1 (SA1):

MV: I'm gonna use the toy ONCE, never again

SA1: no, We'll use it a lot, hope youre sleeping good

MV: Just no

...

SA1: eh.. Im not gonna lie, I got bored of you awhile ago, Im only giving you a chance to entertain me and make me want to fuck you again, I already put several girls ahead of you on my roster that sent me daily pics, earlier on when you said you didn't like taking requested pics, I was like this shit isn't going to work then you completely changed that tune and sent me exactly what I told you to send because you knew it was my way or nothing, I know you don't want to be replaced no matter you trying to pretend, no guy can ever replace me, you know this and you know your 'man' is mediocre and

**doesn't have a Dom bone in his body, you even said he wasn't sexual LOL
yet you keep messaging me about the toy/me using you with it**

27. On or about July 15, 2023 while using the Lovense Remote application the following exchange between MV and the Subject (S) occurred:

S: block me here too, my personal use slut

S: I still have a punishment for disrespecting me

S: youll... find out about it later ahah

MV: Try anything and I will go to the police

S: [skull emoji][skull emoji]

MV: I'm not lying I have loads of information that I can relay to the police

MV: Don't message me, it's overrrrr

28. On or about July 27, 2023 SUBJECT ACCOUNT 1 sent MV the following message, after MV told the Subject that MV no longer wanted to have "esex" [sex over video chat] anymore: "like I said I don't hang out with girls to talk to them about their lives, what, girls aren't that interesting outside of sex unless Im in a relationship/and you disrespected me talking about some other guy that doesn't matter, so you have to rebuild what we had previously to grow more onto it, why would I not flirt with you and you just be angry and pouting when I flirt with some other girl in game... it doesn't have to be ONLY sex, but there will be sexual stuff and flirting, it was never ONLY about sex, it was just when I was able to talk was late at night and that's when were both horny."

29. On or about July 27, 2023 the following exchange took place between MV and SUBJECT ACCOUNT 1 (SA1):

MV: Okay, what's the punishment

SA1: wouldnt you like to know! it wont be too bad, just have to make sure your parents know about you trying to talk to older guys and get them in trouble online, so this doesnt happen again since we dont want anything to do with each other, there ahs to be some lesson that comes from this

MV: Why?/Like what do you want [crying emoji]/ Why do you think it's fit to do this to me?/You're a sociopath

SA1: you lied to me about your age and I was actually 20s that would have been fucked, and then you were lying to me about talking to people while talkihng to me, blocking me won't do much, will justnot give you an option to beg me not to do it

MV: I give up

...

SA1: okay well, I do have your parents emails and their names and was going to send many pics and vids through email and postal service, I had of you doing the sluttiest good girl stuff for me, since it is of you underage, and even if Im your age/I can't exactly keep them, so its important for your parents to know of you sending child nudes remember when you were trying on panties for me and I told you to bend over for me and spread your ass, I have them all and your room in the background

MV: Okay/Well I'll prolly not be on discord for a while/ I hope this was worth it

SA1: Im saying I don't want to, but you not cooperating with me isn't helping

MV: There's nothing I can do/You want to ruin me/Just ruin me/I need an excuse to be off this app/And to stop talking to older guys/You were the first person I did everything I've done for/And my last

SA1: not ruin, just teach you a lesson, you have no power, this will happen if you don't listen to Daddy, ofcourse Ill be your last, because you belong to me

MV: Even if you send the email/I learned my lesson/Don't do this online/Don't give out your info online/Don't show your face online/You never know whose in the other side of the screen/Good thing you stayed protected

...

SA1: you are unsafe if I choose you to be but I don't want anything bad for you

...

SA1: its not what you want, if I wanted to ruin you I would hire a couple of your highschool peeps to post polaroids of your nudes at the school/like i said, its not about ruining you I like you, that's why youll belong to me

...

SA1: you dont choose if the punishment is swift or not, I do or if there is one at all, add me on lovense, its one of the only ways to prevent everything from crashing down because I don't want to but I have everything ready and itll be shipped out slowly, here and there, and it will affect you/and no to cheat on me I would have had to fuck you and claim your body as Daddy's

...

MV: I'm going to tell my dad

SA1: ? that wont stop me from sending out everything, will just make it worse

MV: I'd rather he know than getting surprised to see his daughter

SA1: you will feel better once Daddy's whispering in your ear telling you to cum for him, and like I said I won't send them if you listen to my commands, there wont be a surprise for your dad, these pics and vids have your face in them, biting your lip, cumming for me vids begging

MV: I know what I've done

...

SA1: out of sight out of mind?, it wont be out of mind when you see yourself posted around school, be fr

MV: I know this already

SA1: you dont know though

MV: I know/This is overwhelming

SA1: you have no idea how this will affect youre life, its not something you want

...

SA1: its not about giggles, what...?, its about showing you, you have no power but also you have no options you aren't going to tell your parents willfully, thats not you, "Dad some guy I lied to about my age is going to send you my nudes and vids of me cumming by his command"

MV: If I stay/I'll eventually leave one day/And you will still do this/So no/Get it done

SA1: you can leave one day, idc [I don't care] but right now youre mine

...

MV: I'm not gonna run or hide/I'll take the punishment

SA1: this isn't out of sight out of mind, In doing you a favor rn, its not something you want, and if you are with any guys you think hes going to want to be with somebody that begs to cum like that posted all over your school, I can hire people to send those through tiktok and linking your tiktok, you don't relaize how deep this goes

MV: Okay

...

SA1: even with this youre such a perfect submissive slut, can't wait to use that pretty pussy after your period is over

MV: No/You have pics to use/You don't need me

SA1: ? I have vids to, but you're amazing, love your little moans for me

MV: Well you have pics and vid's

SA1: youll cum hard for Daddy and Ill even edge you like you wanted

MV: You don't need me

...

SA1: you belong to me until Im done with you, im not going to punish you, how youll redeem yourself is through lovense and Daddy making you cum for him, after we have fun I will let you go I will let you free, once you listen to me... Im going to let you go free after Im done with you and delete everything... no I wont send anything if you listen to me, add me on lovense,

we'll play once youre off your period and Ill let you free once I see you on cam cumming and begging for Daddy... in any case, the deal is, Daddys going to use you into his hearts concent, and then once Im done Ill delete everything and youll get rid of my toy and we'll move on with our lives and forget about each other/you can leave once Im done with you and you can't expose me, Ill expose you to everyone

...

MV: Okay/I'll kill myself

SA1: past that, this is the easiest option of your life/obviously dont do that I care about you, but that pussy is what I will get before we move on

MV: Please see my pussy closed/*sew

SA1: huh

MV: Pease

SA1: its already tight it doesnt need it

MV: Please come her/Come here/Come and kill me yourselfd/Please/Please ruin my life

SA1: can I fuck you before I kill you?

MV: Please/No

SA1: oh then no what

MV: Anything but that

SA1: lol

MV: At this point/I'm thinking about killing mhself/I'm not worth this

SA1: no that is how you redeem yourself to me, cumming for me on cam and Ill delete everything

...

MV: You fucking bitch/Goodluck trying to use that [MV sends an image of a broken vibrator]/You're a fucking pussy

SA1: lets see if it still works

MV: I threw it away

SA1: okay well you cant throw away your hands/like I said nothing is going to get you out of what I said

30. On or about July 28, 2023 on the Lovense Remote application the Subject sent MV a message which stated "you can't hide from nothing, you wanting me to fuck you just proves you don't want this to happen, youre smart going this route... and you know better, unblock me on discord, you ain't running or hiding from me, blocking does nothing except surprises you when and if I decide to release everything, because you didn't redeem yourself to me."

31. These chats show that the Subject, the user of the SUBJECT ACCOUNTS, knew that MV was a minor, received sexually explicit images and videos from MV, and requested that MV self-produce further sexually explicit videos consistent with the definition of CSAM of MV or the Subject would release the images/videos that the Subject already had.

32. On or about July 28, 2023 a Preservation Request for the SUBJECT ACCOUNTS was served on Discord by an Operational Support Technician with FBI Milwaukee.

33. Through my training and experience in investigations pertaining to attempted production of child pornography/CSAM via online chats, I know that it is likely if the subject has attempted production with one victim, they will have attempted it with other victims as well.

34. This shows there is probable cause to believe that evidence of violations of federal law will be found within the SUBJECT ACCOUNTS.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

35. According to Discord, Inc.'s law enforcement guide, the following items are available with a search warrant: Basic subscriber data, the unique User ID number of the account that is assigned by Discord, registration date and time for the account, registration IP address of the account, email address provided by the user, user's current username and tag number, if the user is a paid subscriber, limited billing information, IP addresses and session start-timestamps, Discord stored messages and attachments that users send to each other in text channels, whether it's in a server or in direct messages.

36. As explained herein, information stored in connection with a Discord, Inc. account may provide crucial evidence of the "who, what, why, when, where and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a messaging application user's communication logs, stored electronic communications, and other data retained by Discord, Inc., can indicate who has used or controlled the Discord account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. Discord account activity can show how and when the account was accessed or used. For example, as described herein, Discord, Inc. logs the Internet Protocol (IP) addresses from which users access their accounts

along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Discord access, use, and events relating to the crime under investigation. Additionally, Discord account activity may provide relevant insight into the Discord account owner's state of mind as it relates to the offense under investigation. For example, information in Discord chats may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

37. Therefore, the computers of Discord are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Discord, such as account access information, transaction information, and other account information.

SEARCH PROCEDURE

38. From my training and experience, I know that Discord cannot, on its own, identify individual items of potential evidentiary value within user's account. Accordingly, this search warrant anticipates a multi-step approach for serving the warrant, obtaining responsive information from Discord, Inc., and then searching the responsive information to identify potential evidence.

39. Pursuant to the Electronic Communications Privacy Act, in particular 18 U.S.C. 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), I will serve the warrant on Discord, Inc. Discord, Inc. will, at a later date, disclose to the government copies of the records and other information

(including the content of communications and stored data) particularly described in Attachment B. Once received, the government will search the records and information provided by Discord, Inc. to locate items and evidence relating to the crimes under investigation, specifically Title 18 U.S.C. 2252, including:

- a. Messages discussing child pornography;
- b. Photographs, videos, or images of child pornography
- c. Chats discussing child pornography
- d. Chats between the user and any minor;
- e. Chats between the user and any known or potential victims
- f. Evidence indicating how and when the account was accessed or used, to determine the chronological context of account access, use, and events relating to the crime under investigation and to the account owner;
- g. Evidence indicating the account owner's state of mind as it relates to the crime(s) under investigation;
- h. All items tending to show who was in control of the account and who used or owned the device(s) associated with this account including email addresses, images, recovery emails, cookies data, geolocation data, documents, IP logs, and other communication records; and
- i. All other information or items that constitute fruits, contraband, evidence, or instrumentalities of violations of 18 USC § 2252, those violations involving the Subject Account and occurring since May 1, 2023.

CONCLUSION

23. Based on the forgoing, I request that the Court issue the proposed search warrant. Because the warrant will be served on Discord, Inc. who will then compile the requested records at a time convenient to it, there exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.

Attachment A
Property to be Searched

This warrant applies to information associated with Discord, Inc. usernames “**pill0wtalk**” and “**greygrim**” that is stored at premises owned, maintained, controlled, or operated by Discord, Inc. with company headquarters at 444 De Haro St., San Francisco, California.

Attachment B
Particular Things to be Seized

I. Information to be disclosed by Discord, Inc.

To the extent that the information associated with the accounts described in Attachment A is within the possession, custody, or control of Discord Inc., regardless of whether such information is located within or outside of the United States, and including any messages, records, files, logs, or information that have been deleted but are still available to Discord, Inc., or have been preserved pursuant to a request made, Discord, Inc. is required to disclose the following information to the government for each account or identifier listed in Attachment A, from May 1, 2023 to the present:

- a. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);
- b. The types of service utilized by the user;
- c. All records or other information stored by an individual using the account, including saved communications, image files or video files;
- d. All records pertaining to communications between Discord Inc. and any person regarding the account, including contacts with support services and records of actions taken.

The Provider is hereby ordered to disclose the above information to the government within 14 days of issuance of this warrant.

II. Information to be seized by the Government

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of 18 U.S.C. 2252(a)(2), 2251(a), and 2252(a)(4)(B) involving the account described in Attachment A since May 1, 2023, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- a. Images of child pornography, as defined in 18 U.S.C. 2256.
- b. Any record or document pertaining to the possession, receipt, and/or distribution of child pornography, as defined in 18 U.S.C. 2256.
- c. Any record or document identifying persons transmitting, through interstate commerce, including by computer, any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- d. Any record or document bearing on the receipt, shipment, orders, requests, trades, purchases, or transactions of any kind involving the transmission through interstate commerce, including by computer, of any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- e. Any record or document pertaining to the preparation, purchase, and acquisition of names or lists of names to be used in connection with the receipt, distribution, trade,

- or transmission, through interstate commerce, of any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- f. Any record or document which lists names and addresses of any minor visually depicted while engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
 - g. Any record or document which shows the offer to transmit through interstate commerce any depictions of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
 - h. Any and all materials or items which are sexually arousing to individuals who are interested in minors, but which are not in and of themselves obscene or which do not necessarily depict minors involved in sexually explicit conduct. Such material is commonly known as, "child erotica" and includes written materials dealing with child development, sex education, child pornography, sexual abuse of children, incest, child prostitution, missing children, investigative techniques of child exploitation, sexual disorders, pedophilia, nudist publications, diaries, and fantasy writings. "Child erotica," may also include, in this context, sex aids and/or toys.
 - i. Electronically stored communications or messages reflecting computer online chat sessions or e-mail messages with, or about, a minor that are sexually explicit in nature, as defined in 18 U.S.C. § 2256.
 - j. The identity of the person(s) who created or used the account listed in Attachment A, including records that help reveal the whereabouts of such person(s).
 - k. The identity of the person(s) who communicated with the account listed in Attachment A about matters relating to 18 U.S.C. 2252A(a)(2) and 2252A(a)(5)(B), including records that help reveal their whereabouts.
 - l. Chats between the user and any minor.
 - m. All other information or items that constitute fruits, contraband, evidence, or instrumentalities of violations of 18 USC § 2252, those violations involving the Subject Accounts and occurring since May 1, 2023.

This warrant authorizes a review of electronically stored information, communications, other records, and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts.